

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Heather J. McDonald
Email: hmcDonald@bakerlaw.com

*Attorneys for Irving H. Picard, Esq., as Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

SAGE ASSOCIATES;

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04362 (SMB)

LILLIAN M. SAGE, IN HER CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE
ASSOCIATES AND INDIVIDUALLY AS
BENEFICIARY OF SAGE ASSOCIATES;

MALCOLM H. SAGE, IN HIS CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE
ASSOCIATES, INDIVIDUALLY AS
BENEFICIARY OF SAGE ASSOCIATES, AND AS
THE PERSONAL REPRESENTATIVE OF THE
ESTATE OF LILLIAN M. SAGE;

MARTIN A. SAGE, IN HIS CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE
ASSOCIATES AND INDIVIDUALLY AS
BENEFICIARY OF SAGE ASSOCIATES;
AND

ANN M. SAGE PASSER, IN HER CAPACITY AS
PARTNER OR JOINT VENTURER OF SAGE
ASSOCIATES AND INDIVIDUALLY AS
BENEFICIARY OF SAGE ASSOCIATES,

Defendants.

SIXTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures were served by: December 21, 2015
2. Fact Discovery was completed on: July 5, 2018
3. The Disclosure of Case-in-Chief Experts shall be due: January 16, 2019
4. The Disclosure of Rebuttal Experts shall be due: March 25, 2019
5. The Deadline for Completion of Expert Discovery shall be: May 6, 2019

6. The Deadline for Service of a Notice of Mediation Referral shall be: May 20, 2019
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: June 3, 2019
8. The Deadline for Conclusion of Mediation shall be: September 25, 2019

Dated: September 6, 2018
New York, New York

By: /s/ Nicholas J. Cremona
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Heather J. McDonald
Email: hmcDonald@bakerlaw.com

BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Esq., as Trustee for the
Substantively Consolidated SIPA Liquidation of Bernard
L. Madoff Investment Securities LLC and Estate of
Bernard L. Madoff*

/s/ Andrew B. Kratenstein
Consented To:

Andrew B. Kratenstein

McDermott Will & Emery LLP
340 Madison Avenue
New York, NY 10173-1922
Telephone: (212) 547-5695
Facsimile: (212) 547-5444

Attorneys for Defendants